

EXHIBIT J

CLOSED

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DETROIT FREE PRESS, INC.,
A Michigan Corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE,

Defendant.

Civil Action No. 05-71601
JUDGE ANNA DIGGS TAYLOR

FILED
2005 OCT - 7 11 P 12:31
U.S. DIST. COURT CLERK
EAST. DIST. MICHIGAN
DETROIT

JUDGMENT IN A CIVIL CASE

For the reasons stated on the record at the hearing held September 19, 2005, plaintiff's motion for summary judgment, filed July 7, 2005 [Dkt #14], is hereby denied and defendant's cross-motion for summary judgment, filed August 2, 2005 [Dkt #15], is hereby granted.

Judgment is entered for defendant. For the reasons also stated on the record, the Court finds that plaintiff is entitled to attorneys' fees and costs. Plaintiff's petition for such fees and costs shall be filed within 30 days of the entry of this order. Any response thereto by defendant shall be filed within twenty-one days after service thereof.

IT IS SO ORDERED.

DATED: October 7th, 2005


ANNA DIGGS TAYLOR
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing *Order* was served upon counsel of record via the Court's ECF System to their respective email addresses or First Class U.S. mail disclosed on the Notice of Electronic Filing on October 7, 2005.

s/Johnetta M. Curry-Williams
Case Manager

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DETROIT FREE PRESS, INC.,	)	
A Michigan Corporation,	)	
	)	
Plaintiff,	)	Civil Action No. 05-71601
	)	Judge Anna Diggs Taylor
v.	)	
	)	
UNITED STATES DEPARTMENT OF	)	
JUSTICE,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
IN WHICH TO RESPOND TO PLAINTIFF'S PETITION
FOR AN AWARD OF COSTS AND FEES**

Defendant, by and through undersigned counsel, hereby seeks an extension of time through and including December 16, 2005, in which to file a response to Plaintiff's Petition for an Award of Costs and Fees on the ground that the parties are attempting to settle this matter without further court involvement and require an additional period of time in which to complete their negotiations. On November 21, 2005, undersigned counsel conferred with counsel for plaintiff, Herschel M. Fink, Esq., who indicated that he had no objection to the relief requested herein. As grounds for this motion, defendants state as follows:

1. On October 7, 2005, the Court entered judgment in this matter in favor of defendant, but found that plaintiff was entitled to fees and costs (Docket No. 22), and ordered plaintiff to file a petition for fees within 30 days, with defendant to file a response 21 days thereafter.
 2. On November 4, 2005, plaintiff filed its petition for fees and costs (Docket No. 23).
- Pursuant to the Court's October 7, 2005, Judgment, defendant's response to plaintiff's petition is

due to be filed on November 28, 2005.

3. The parties are attempting to settle this matter without the need for further Court intervention. Defendant respectfully requests, accordingly, that it be granted an extension of time, through and including December 16, 2005, in which to respond to plaintiff's petition for fees and costs, so as to afford the parties additional time to continue their discussions.

WHEREFORE, for the reasons stated herein, defendant respectfully requests an extension of time, through and including December 16, 2005, in which to file a response to Plaintiff's Petition for an Award of Costs and Fees. A proposed order is attached for the convenience of the Court.

Respectfully submitted,

PETER D. KEISLER
Assistant Attorney General, Civil Division

STEPHEN J. MURPHY
United States Attorney

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/s/ Rupa Bhattacharyya
RUPA BHATTACHARYYA
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Dated: November 22, 2005

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DETROIT FREE PRESS, INC.,
A Michigan Corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE,

Defendant.

Civil Action No. 05-71601
Judge Anna Diggs Taylor

[PROPOSED] ORDER

The Court, having fully considered the Defendants' Unopposed Motion for an Extension of Time in Which to Respond to Plaintiff's Petition for an Award of Costs and Fees, and finding that Motion to be well-taken, hereby ORDERS that defendants' Motion is granted. Defendants shall have through and including December 16, 2005, in which to file a memorandum in response to Plaintiff's Petition.

IT IS SO ORDERED, this _____ day of _____, 2005.

UNITED STATES DISTRICT JUDGE

CERTIFICATION OF SERVICE

I hereby certify that on November 22, 2005, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Herschel P. Fink
hpff@honigman.com

Brian D. Wassom
bdw@honigman.com

I further certify that I have mailed by U.S. mail the paper to the following non-ECF participants:

None

/s/ Rupa Bhattacharyya
(Virginia Bar No. 38877)
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UNITED STATES DISTRICT JUDGE

Herschel P. Fink

HONIGMAN

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Attorneys and Counselors

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December 8, 2005

Case Manager
Hon. Anna Diggs Taylor
United States District Court
231 W. Lafayette
Detroit, MI 48226

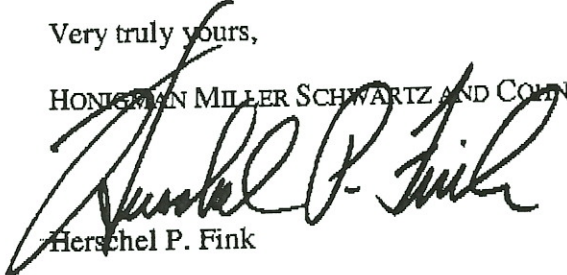
*Re: Detroit Free Press v U. S. Department of Justice
Civil Action No. 05-71601 (E.D. Mich.)*

Dear Madam:

Pursuant to our telephone discussion today, this is to advise the Court that the parties have settled the matter of attorney fees and costs, and the Detroit Free Press withdraws its pending fee petition. This resolves the final issue in the above referenced case. Please let me know if the Court needs anything further.

Very truly yours,

HONIGMAN MILLER SCHWARTZ AND COHN LLP


Herschel P. Fink

c: Rupa Bhattacharyya
U. S. Department of Justice
Civil Division

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DEC 13 2005

Anna Diggs Taylor
U.S. District Court

FILED
DEC 20 10 P 3:12
U.S. DISTRICT COURT
DETROIT